

Moreover, the requirement that a special accounting system be used by systems in cost of service is not consistent with the manner in which rate cases arise or with the filing deadlines established by the Commission's rules. A cable system receives only 30 days notice that it is about to come under regulation either through certification of its franchising authority or through the filing of a valid complaint. It is simply not possible to adopt a new accounting system in the amount of time allotted for the filing of a cost of service case.

Comcast also believes that the Commission has vastly underestimated the task of imposing a uniform system of accounts on an industry that does not currently use uniform accounting. It took the Commission the better part of a decade to revise the telephone USOA. It is highly unlikely that a uniform accounting system for cable could be adopted and implemented in time for the cost of service cases that will arise in the first five years under regulation. The large effort on the part of both the industry and the Commission that devising this accounting system will require will most likely be undertaken in vain, because most of the cases will be decided before it is in place.

VI. CONCLUSION


For the reasons stated above, the Commission must stay or withdraw both the presumptive disallowance of preregulation investments in tangible and intangible assets of cable television systems, and the presumption that rates calculated using returns on investments above 11.25% are unreasonable. It must provide in its cost of service rules mechanisms for allowing regulated cable

systems to, over time, recover and earn return on preregulation investments. It should also reconsider its decision to impose a uniform accounting system in the cable industry.

Respectfully submitted,

COMCAST CABLE COMMUNICATIONS, INC.

By:

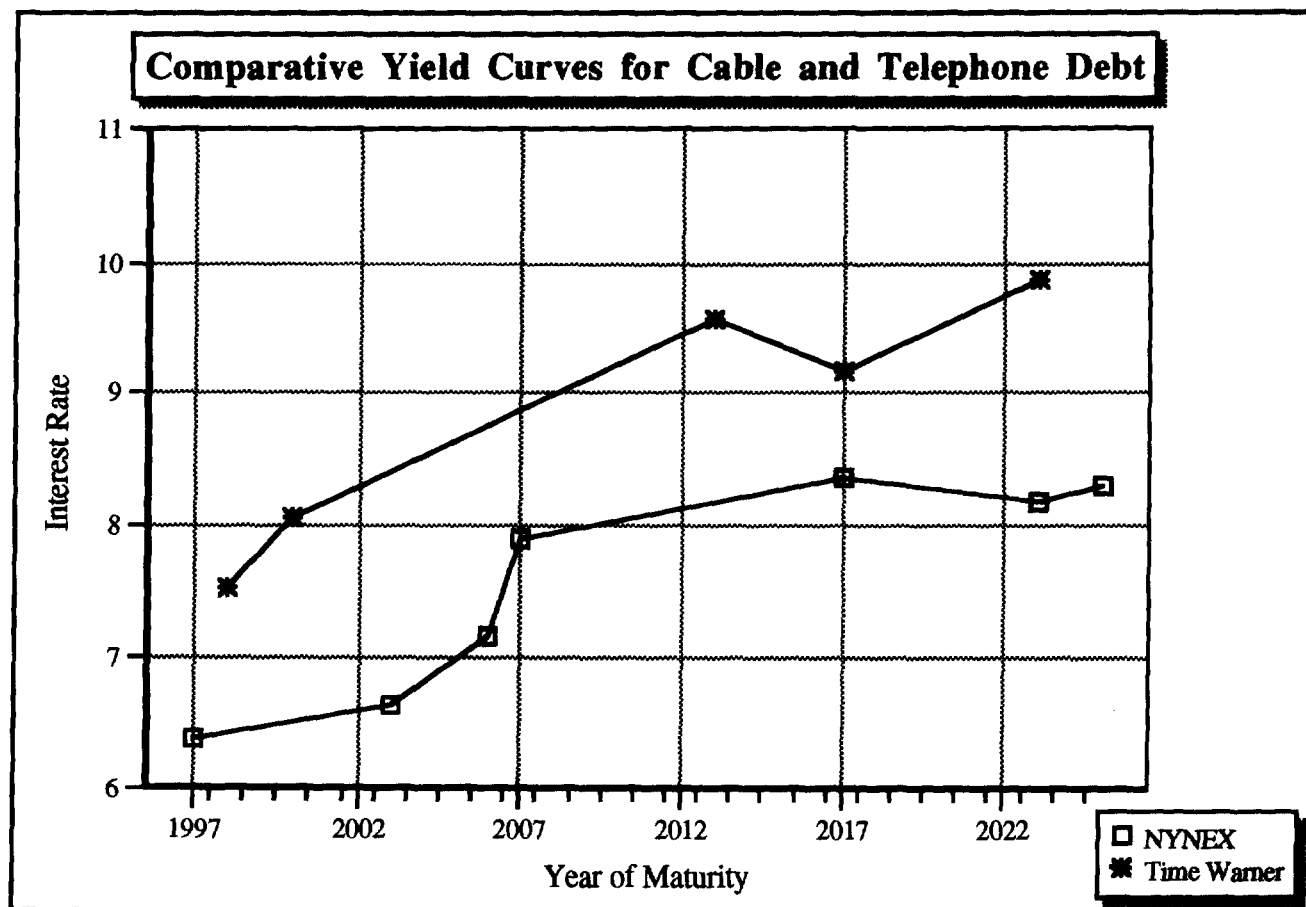

Leonard J. Kennedy

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May 16, 1994

EXHIBIT 2

**Comparative Yields of
Telephone and Cable Debt**



Data used in chart:

NYNEX		Time Warner	
Maturity	Yield	Maturity	Yield
1997	6.38	1998	7.54
2003	6.65	2000	8.06
2006	7.16	2013	9.57
2007	7.89	2017	9.16
2017	8.36	2023	9.87
2023	8.17		
2025	8.30		

All yields are as of June 29, 1994, as reported in The New York Times, June 30, 1994, at D9. Excludes convertible bonds.

CERTIFICATE OF SERVICE

I, Tammi A. Foxwell, a secretary at the law firm of Dow, Lohnes & Albertson, do hereby certify that on this 1st day of July, 1994, I have had hand delivered the foregoing "COMMENTS" to the following:

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554
(STOP CODE 0101)

The Honorable James H. Quello
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20554
(STOP CODE 0106)

The Honorable Andrew C. Barrett
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 826
Washington, D.C. 20554
(STOP CODE 0103)

The Honorable Susan Ness
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554
(STOP CODE 0104)

The Honorable Rachelle B. Chong
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554
(STOP CODE 0105)

Meredith Jones, Esq.
Chief, Cable Services Bureau
Federal Communications Commission
2033 M Street, N.W., Room 918
Washington, D.C. 20554
(STOP CODE 1200)

A handwritten signature in cursive script that reads "Tammi A. Foxwell". The signature is written in dark ink and is positioned above a horizontal line.

Tammi A. Foxwell